

From: Ferguson, Laura G. [lferguson@milchev.com]
Sent: Monday, June 08, 2009 3:08 PM
To: David J. Strachman
Cc: Rochon, Mark; McAleer, Chas
Subject: Sokolow v. PLO

Dave,

We are in receipt of your letter of June 8, 2009, in which you inquire as to the terms under which we as counsel for Defendants will produce Document 02:000568. Having reviewed the document, we can report the following:

We, as counsel for Defendants, have a copy of this document only because it was attached as an exhibit to a filing by the plaintiffs, represented by Robert Tolchin, in *Mohamad v. Rajoub*, No. 1:05-cv-08335-LAP (SDNY) (Dkt. No. 44-11). You can of course access the document from the *Mohamad v. Rajoub* docket through Pacer.

This document was produced by the Palestinian Pension Fund for the State Administrative Employees in the Gaza Strip ("Pension Fund") in *Estate of Ungar by and Through Its Administrator, David Strachman, et al. v. Palestinian Authority, et al.*, No. 102101/06 (Supreme Court for the State of New York, County of New York). It was apparently assigned bates number of PPF 0029719 as part of that production. As a party in the Pension Fund action, you must already have a copy of the document. We also note that the document, as filed in the *Mohamad v. Rajoub* matter, bore a "CONFIDENTIAL MATERIAL" designation. We do not know whether this document was filed in *Mohamad v. Rajoub* in violation of any protective order in the New York state court Pension Fund litigation.

Given that the document we identified as 02:000568 (or PPF 0029719) is one we have only because it was filed by Mr. Tolchin in the *Mohamad v. Rajoub* matter and that you already have a copy of it, we assume you no longer need a copy from us.

We will respond to the remainder of your letter later this week.

Regards,
Laura

Laura G. Ferguson
Miller & Chevalier Chartered
(202) 626-5567

* * *

This electronic message contains information which may be legally confidential and/or privileged. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

* * *

31 CFR Part 10, Section 10.35, requires us to notify you that any tax advice in this electronic message was not intended or written to be used, and cannot be used, for the purpose of avoiding penalties.